

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ADONNA FROMETA,

Index No.: 07CIV6372

FRCP Rule 26(a)(1) Disclosures

Plaintiff,

-against-

MARIO E. DIAZ-DIAZ, ALL AMERICAN HAULERS
RECYCLING

Defendants.
-----X

PLEASE TAKE NOTICE that the Plaintiff, ADONNA FROMETA, does hereby set forth the following as her FRCP Rule 26(a) (1) disclosure:

1. Persons or entities likely to have discoverable information that may be used to support Plaintiff's claims or defenses:
 - a) All named parties herein
 - b) Police officer who attended the scene of this accident
 - c) Cabrini Medical Center,
227 E 19th Street
New York, NY 10003
 - d) Ranga Krishna, MD
3262 Westchester Avenue
Bronx, NY
 - e) Andrew M. Davy, MD
1513 Voorhies Avenue
Brooklyn, NY
 - f) Arden Kaisman, MD
51 E 25 Street, 6 Floor
New York, NY 10010
 - g) Standup MRI Of Manhattan
253 E 77th Street
New York, NY
 - h) Midtown Medical Practice, PC
Albert Villafuerte, MD
48 E 43rd Street, 6th Floor

New York, NY 10017

i) Myrtle Pharmacy, Inc.
446-A Myrtle Avenue
Brooklyn, NY 11205

j) Ramesh P. Babu, MD
530 First Avenue, Suite 7w
New York, NY 10016

k) Westchester Medical Care, Pc
32-62 Westchester Avenue
Bronx, NY 10461

l) Geico
750 Woodbury Road
Woodbury, NY 11797-2589

* Note authorizations for the above medical providers are being provided herewith. Additionally all records currently in the plaintiff's possession are being exchanged herewith.

2. Documents that may be used to support claims or defenses:

- a) Police report (attached herewith)
- b) Photos of the Plaintiff's vehicle after the accident (attached herewith)
- c) Medical records and records of the following:

Cabrini Medical Center
227 E 19th Street
New York, NY 10003

Ranga Krishna, MD
3262 Westchester Avenue
Bronx, NY

Andrew M. Davy, MD
1513 Voorhies Avenue
Brooklyn, NY

Standup MRI of Manhattan
253 E 77th Street
New York, NY

Midtown Medical Practice, PC
Albert Villafuerte, MD

48 E 43rd Street, 6th Floor
New York, NY 10017

Arden Kaisman, MD
51 E 25 Street, 6 Floor
New York, NY 10010

Myrtle Pharmacy, Inc.
446-A Myrtle Avenue
Brooklyn, NY 11205

Ramesh P. Babu, MD
530 First Avenue, Suite 7w
New York, NY 10016

Westchester Medical Care, PC
32-62 Westchester Avenue
Bronx, NY 10461

3. Damage Computation:


The Plaintiff is claiming damages for past and future medical expenses, cost of surgery and treatment, past and future pain and suffering, loss of past and future enjoyment of life and cost of future surgery(s) and treatment.

4. Insurance Information:

GEICO – No-Fault Carrier
750 Woodbury Road
Woodbury, NY 11797-2589
Claim # 0293057720101027

The plaintiff reserves the right to supplement this disclosure upon receipt of further information.

Dated: New York, New York
September 18, 2007



Allen L. LaRock, Esq. (ALL 8831)
SLAWEK W. PLATTA, PLLC
Attorneys for Plaintiff
42 Broadway, Suite 1927
New York, New York 10004
(212)514-5100

To:

WILSON, ELSE, MOSKOWITZ,
EDELMAN & DICKER LLP
Attorneys for Defendants
MARIO E. DIAZ-DIAZ, ALL AMERICAN HAULERS RECYCLING
150 East 42nd Street
New York, New York 10017-5639
212-490-3000

CERTIFICATION

I hereby certify that the foregoing **FRCP Rule 26(a)(1) Disclosures** are true. I am aware that if any of the foregoing statements made by me are willingly false, I am subject to punishment.



Allen L. LaRock (ALL 8831)

Sworn to before me on this
September 18, 2007



Notary Public

SLAWOMIR W. PLATTA
NOTARY PUBLIC-STATE OF NEW YORK
No. 02PL6171290
Qualified in Kings County
My Commission Expires July 23, 2011

AFFIRMATION OF SERVICE

STATE OF NEW YORK)
) s.s.:
COUNTY OF NEW YORK)

Slawek W. Platta, an attorney admitted to practice law before the courts of the State of New York affirms the following under penalties of perjury, pursuant to CPLR 2106:

That affirmant is not a party to this action and is over the age of 18 years.

That on September 18, 2007, affirmant served the within **FRCP Rule 26(a)(1) Disclosures** upon the defendant(s) and/or attorney(s) for defendant(s) by depositing a true copy of same securely enclosed in a postpaid wrapper in a post office, official depository under the exclusive care and custody of the United States Postal Service within the state of New York, directed to said individuals or offices as follows:

WILSON ELSEER MOSKOWITZ, EDELMAN & DICKER, LLP
150 E 42ND STREET
NEW YORK, NY 10017-5639

these being the respective addresses within the State designated by them for that purpose upon the preceding papers in this action or the respective place where they kept an office between which places there then was and now is a regular communication by mail.



SLAWEK W. PLATTA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X Index No.: 07CIV6372

ADONNA FROMETA,

Plaintiff,

-against-

MARIO E. DIAZ-DIAZ, ALL AMERICAN HAULERS
RECYCLING

Defendants.

-----X

FRCP Rule 26(a)(1) Disclosures

SLAWEK W. PLATTA, PLLC
Attorneys for: Plaintiff
42 Broadway, Suite 1927
New York, New York 10004
(212) 514-5100

Service of a copy of the within is hereby admitted.

Dated, Plaintiff

Attorney(s) for

PLEASE TAKE NOTICE:

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of an _____ duly entered in the office of
the clerk of the within named court on _____ 200__.

☐ NOTICE OF SETTLEMENT

that an order _____ of which the within is a true copy
will be presented for settlement to the HON. _____ one of the judges of
the _____

within named Court, at _____ on

200__ at _____ O'clock __.M.

Dated, September 18, 2007

Yours, etc.

SLAWEK W. PLATTA, PLLC